

**ORIGINAL**

Pro Se 5 (Rev. 12/16) Complaint for a Civil Case Alleging Negligence

**UNITED STATES DISTRICT COURT**

for the

Eastern District of New York

Eastern Division

**FILED**  
IN CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.

★ MAY 13 2021 ★

BROOKLYN OFFICE

21-cv-2930

CHEN, J.

MANN, M.J.

Maketa S Jolly

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

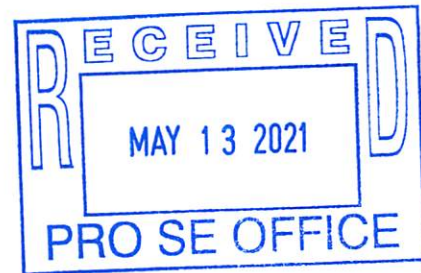
Excelsior College

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No. 1:2014 cv 10408

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☒ Yes ☐ No**COMPLAINT FOR A CIVIL CASE ALLEGING NEGLIGENCE**

(28 U.S.C. § 1332; Diversity of Citizenship)

**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Maketa S.Jolly
Street Address	42 Kingston Terrace
City and County	Aston Delaware County,
State and Zip Code	PA 19014
Telephone Number	610-334-4375
E-mail Address	mjolly@jollyeducationconsultant.com

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

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## Defendant No. 1

Name	Mary Lee Pollard
Job or Title <i>(if known)</i>	Dean of Nursing
Street Address	7 Columbia Circle
City and County	Albany New York
State and Zip Code	12203
Telephone Number	
E-mail Address <i>(if known)</i>	

## Defendant No. 2

Name	Joanne Leone
Job or Title <i>(if known)</i>	Executive Director
Street Address	124 Halsey Street
City and County	Newark Essex County
State and Zip Code	NJ 07102
Telephone Number	
E-mail Address <i>(if known)</i>	

## Defendant No. 3

Name	Phillis Mitchel
Job or Title <i>(if known)</i>	Executive Director
Street Address	89 State Street 3 <sup>rd</sup> Floor
City and County	Montpelier, VT 05620
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

## Defendant No. 4

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Under 28 U.S.C. § 1332, federal courts may hear cases in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000. In that kind of case, called a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff. Explain how these jurisdictional requirements have been met.

**A. The Plaintiff(s)**

1. If the plaintiff is an individual

The plaintiff, (name) Maketa S Jolly, is a citizen of the  
State of (name) Pennsylvania.

2. If the plaintiff is a corporation

The plaintiff, (name) \_\_\_\_\_, is incorporated  
under the laws of the State of (name) \_\_\_\_\_,  
and has its principal place of business in the State of (name) \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

**B. The Defendant(s)**

1. If the defendant is an individual

The defendant, (name) Excelsior College, is a citizen of  
the State of (name) New York. Or is a citizen of  
(foreign nation) \_\_\_\_\_.

2. If the defendant is a corporation

The defendant, (name) \_\_\_\_\_, is incorporated under  
the laws of the State of (name) \_\_\_\_\_, and has its  
principal place of business in the State of (name) \_\_\_\_\_.  
Or is incorporated under the laws of (foreign nation) \_\_\_\_\_,  
and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

**C. The Amount in Controversy**

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

Undefined

### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

On (date) 08/15/2018, at (place) New York, Excelsior College,

the defendant(s): (1) performed acts that a person of ordinary prudence in the same or similar circumstances would not have done; or (2) failed to perform acts that a person of ordinary prudence would have done under the same or similar circumstances because *(describe the acts or failures to act and why they were negligent)*

Mary Lee Pollard scribed an inaccurate academic letter with personal and academic data, distributing the contents to fifty state boards of nursing and outlying countries. Typically, administrators will not divulge private information of students. The plaintiff was no longer akin to the college at the time the college made the public submission. Because the college students policy explains their commitment to the protection of student data, the release and continual relacase of data to public repositories have been harmful.

The acts or omissions caused or contributed to the cause of the plaintiff's injuries by *(explain)*

- (1) Mary Lee Pollard and all others have made purposeful attempts to redact the academic career of the plaintiff to simulate a racist false narrative of African American black wealfare student, something akin to LPN.
- (2) At all times the federal court docket revealed evidence of collegiate conferral, and the purpose of the falsified langaue was to malign the character of the plaintiff through the use of racists stereotypes.
- (3) Mary Pollard also knew at the time she scribed the falsified data that Excelsior College previous approved transcript submissions to other state boards of nursing
- (4) Joanne Leone New Jersey Board of Nursing has known ad Mary Lee Pollard and event through the states data base that the plaintiff earned the Registered Nurse License that she illegal revoked.
- (5) New Evidence suggests that Mrs. Leone has provided Execelsior College defense with information procured through cured the State of New Jersey Database
- (6) New Evidence suggests that Leone has submitted fraudulent information into federal databases

### IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

- (1) Permanent Injunction against the State of New Jersey
- (2) Redaction of all federal and state information ( publicized ) with my information associated
- (3) Seal the recod from public view with regards to falsified findings admitted through Laura Juffa and all others.
- (4) Compensate the Plaintiff for lost wages as of 2017 until the present estimating 300,000.00 thousand dollars.
- (5) Actual Damage is undefined

## V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

### A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 05/06/2018

Signature of Plaintiff

Printed Name of Plaintiff Maketa S. Jolly M.ED., ABD

### B. For Attorneys

Date of signing: \_\_\_\_\_

Signature of Attorney \_\_\_\_\_

Printed Name of Attorney \_\_\_\_\_

Bar Number \_\_\_\_\_

Name of Law Firm \_\_\_\_\_

Street Address \_\_\_\_\_

State and Zip Code \_\_\_\_\_

Telephone Number \_\_\_\_\_

E-mail Address \_\_\_\_\_

EMERALD  
JUSTICE

MAKETA S. JOLLY  
484-442-0104  
MEDIA, PA19063

United States Dot  
Unit Express Post  
225 Cadman Plz E  
Brooklyn, NY 11201

MS  
UN

1120131832 0030

